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Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KRISTA PERRY, an individual;
LARISSA MARTINEZ, an
individual; and JAY BARON, an
individual,
Plaintiffs,

v.

SHEIN DISTRIBUTION
CORPORATION, a Delaware
corporation; ROADGET BUSINESS
PTE. LTD; ZOETOP BUSINESS
COMPANY, LIMITED; and DOES
1-10 inclusive.

Defendants.

CASE NO. 2:23-cv-05551

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
FILING OF PLAINTIFFS' FIRST
AMENDED COMPLAINT AND
DEFENDANTS' DEADLINE TO
RESPOND**

Hon. Mark C. Scarsi

1 This Stipulation is made and entered into by and among Plaintiffs Krista
2 Perry, Larissa Martinez, and Jay Baron (collectively, “Plaintiffs”) and Defendants
3 Shein Distribution Corporation, Roadget Business Pte. Ltd., and Zoetop Business
4 Company, Limited (collectively, “Defendants,” and together with Plaintiffs, the
5 “Parties”), through their respective counsel, with reference to the following:

6 WHEREAS, on July 11, 2023, Plaintiffs filed their initial Complaint against
7 Defendants in this action (ECF. No. 1);

8 WHEREAS, on July 28, 2023, Defendants agreed to waive service of a
9 summons in this action, and, as a result, Defendants’ current deadline to respond to
10 the Complaint is September 26, 2023;

11 WHEREAS, on September 12, 2023, the Parties met and conferred pursuant
12 to Local Rule 7-3 to discuss Defendants’ contemplated motion to dismiss Plaintiffs’
13 RICO claim pursuant to Fed. R. Civ. P. 12(b)(6) and motion to strike portions of
14 the Complaint pursuant to Fed. R. Civ. P. 12(f);

15 WHEREAS, after discussing the grounds for Defendants’ contemplated
16 motions, Plaintiffs stated their intent to amend their Complaint as a matter of course
17 to, among other things, add further allegations regarding their RICO claim and
18 additional plaintiffs;

19 WHEREAS, the Parties believe that, in order to conserve the Court’s and the
20 Parties’ resources, good cause exists to defer Defendants’ deadline to respond to the
21 initial Complaint until after Plaintiffs have filed their First Amended Complaint and
22 to enter a briefing schedule governing any motion(s) filed by Defendants;

23 WHEREAS, the Parties have not sought any other extensions of time in this
24 action; and

25 WHEREAS, the Parties do not seek to reset these dates for the purpose of
26 delay, and the proposed modification will not affect any additional pre-trial and trial
27 dates, which have not yet been set by the Court.
28

1 IT IS HEREBY STIPULATED AND AGREED, by and among the Parties,
2 subject to approval of the Court, as follows:

3 1. Plaintiffs shall have 21 days from the date this Stipulation is approved
4 by the Court to file a First Amended Complaint;

5 2. Defendants shall have 21 days to answer, move against, or otherwise
6 respond to the First Amended Complaint;

7 3. Plaintiffs shall have 30 days to file their opposition to any motion(s)
8 filed by Defendants;

9 4. Defendants shall have 30 days to file their reply in support of any
10 motion(s); and

11 5. Nothing in this stipulation shall be construed as a waiver of any of
12 Defendants' rights or defenses.

13 IT IS SO STIPULATED.

14
15 DATED: September 19, 2023 PAUL HASTINGS LLP

16
17 By: /s/ Steven A. Marenberg
18 Steven A. Marenberg
19 *Attorneys for Defendants*

20 DATED: September 19, 2023 ERIKSON LAW GROUP

21
22 By: /s/ David A. Erikson
23 David A. Erikson
24 *Attorneys for Plaintiffs*

25 **ATTESTATION**

26 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
27 signatories listed concur in this filing's content and have authorized this filing.
28